

EXHIBIT A

Fleming, Lindsay A.

From: Barton, Eric
Sent: Thursday, May 27, 2021 4:58 PM
To: Robert Brennan
Cc: Fleming, Lindsay A.; Robert Bichler
Subject: RE: Nicollette demand letter to Equifax

Great -- we'll get you a draft settlement agreement for Mr. Nicollette (consistent with our prior settlements).

As for Mr. Pavel, like the others, Equifax will remove the account from his disclosure, so it won't reappear. Do we have a deal there too?

In terms of the other settlements, I can confirm that we've passed along all fully executed settlements to Equifax and they are processing the checks. I will tell you that those checks are cut in Costa Rica, so it does take some time, but it's being done.

Thanks.

Eric Barton | Partner
Atlanta | Ext: 716772 (+1-404-885-6772)
ebarton@seyfarth.com

From: Robert Brennan <rbrennan@brennanlaw.com>
Sent: Thursday, May 27, 2021 3:54 PM
To: Barton, Eric <EBarton@seyfarth.com>
Cc: Fleming, Lindsay A. <lafleming@seyfarth.com>; Robert Bichler <rbichler@brennanlaw.com>
Subject: RE: Nicollette demand letter to Equifax

[EXT. Sender]

Mr. Barton,

Mr. Nicolette accepts EFX' offer.

Mr. Pavel wants assurance that the Tesla account will be permanently deleted from his EFX credit report.

Also, we have several cases that have settled and I have not seen any checks. When can my clients & I expect them?

Bob Brennan

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From: Barton, Eric <EBarton@seyfarth.com>
Sent: Thursday, May 27, 2021 11:37 AM
To: Robert Brennan <rbrennan@brennanlaw.com>
Cc: Fleming, Lindsay A. <laflaming@seyfarth.com>; Robert Bichler <rbichler@brennanlaw.com>
Subject: RE: Nicollette demand letter to Equifax

Understood and, yes, tradeline deletion would obviously be part of this.

Lindsay, please get Mr. Brennan the documents.

Thanks.

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From: Robert Brennan <rbrennan@brennanlaw.com>
Sent: Thursday, May 27, 2021 2:24 PM
To: Barton, Eric <EBarton@seyfarth.com>
Cc: Fleming, Lindsay A. <laflaming@seyfarth.com>; Robert Bichler <rbichler@brennanlaw.com>
Subject: RE: Nicollette demand letter to Equifax

[EXT. Sender]

Mr. Barton, I will convey your email to my clients. We will also need the EFX basic document production and will also need tradeline deletion as part of any settlement.

Bob Brennan

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From: Barton, Eric <EBarton@seyfarth.com>
Sent: Wednesday, May 26, 2021 6:23 PM
To: Robert Brennan <rbrennan@brennanlaw.com>
Cc: Fleming, Lindsay A. <laflaming@seyfarth.com>; Robert Bichler <rbichler@brennanlaw.com>
Subject: RE: Nicollette demand letter to Equifax

Mr. Brennan-

The Nicollette case is nearly identical to Lubinsky and Chaine, both of which involved multiple disputes and settled for [REDACTED] Equifax also never paid for a "filing fee" for any of those settlements.

Therefore, consistent with numerous prior settlements, please let me know if we can wrap this one up for [REDACTED] Also, please confirm we can settle Pavel for [REDACTED] as well.

Thank you.

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From: Robert Brennan <rbrennan@brennanlaw.com>
Sent: Wednesday, May 26, 2021 12:52 PM
To: Barton, Eric <EBarton@seyfarth.com>; Robert Bichler <rbichler@brennanlaw.com>
Cc: Fleming, Lindsay A. <laflaming@seyfarth.com>; Robert Brennan <rbrennan@brennanlaw.com>
Subject: RE: Nicollette demand letter to Equifax

[EXT. Sender]

Mr. Barton, is this a one-dispute case? Also, if I am saving EFX a filing fee, I think it only fair that EFX throw that in on this one.

Bob Brennan

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From: Barton, Eric <EBarton@seyfarth.com>
Sent: Wednesday, May 26, 2021 5:37 AM
To: Robert Bichler <rbichler@brennanlaw.com>; Robert Brennan <rbrennan@brennanlaw.com>
Cc: Fleming, Lindsay A. <laflaming@seyfarth.com>
Subject: RE: Nicollette demand letter to Equifax

Robert-

I see the summons was issued to Equifax yesterday. Two questions:

1. Would you like me to simply waive service of this one? I see no need for you to formally serve Equifax. Just let me know.
2. Perhaps more importantly, this matter seems identical to matters that we previously settled for [REDACTED] Can we go ahead and wrap it up for that amount?

Thank you.

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From: Robert Bichler <rbichler@brennanlaw.com>
Sent: Tuesday, May 25, 2021 12:05 PM
To: Barton, Eric <EBarton@seyfarth.com>; Draper, Courtney L. <cdraper@seyfarth.com>
Cc: Robert Brennan <rbrennan@brennanlaw.com>; Juan Sanchez <jsanchez@brennanlaw.com>; Fleming, Lindsay A. <laflaming@seyfarth.com>; Tom Quinn <tquinn@nokesquinn.com>; Nancy Mendoza <nmendoza@brennanlaw.com>; Draper, Courtney L. <cdraper@seyfarth.com>
Subject: RE: Nicollette demand letter to Equifax

[EXT. Sender]

Thanks. See attached with Equifax Confirmation Number re Jack Nicollette's dispute to Equifax.

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Senior Paralegal

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From: Barton, Eric <EBarton@seyfarth.com>
Sent: Tuesday, May 25, 2021 5:09 AM
To: Robert Bichler <rbichler@brennanlaw.com>
Cc: Robert Brennan <rbrennan@brennanlaw.com>; Juan Sanchez <jsanchez@brennanlaw.com>; Fleming, Lindsay A. <lafleming@seyfarth.com>; Tom Quinn <tquinn@nokesquinn.com>; Nancy Mendoza <nmendoza@brennanlaw.com>; Draper, Courtney L. <cdraper@seyfarth.com>
Subject: RE: Nicollette demand letter to Equifax

No problem.

Just let me know if you'd like me to accept service. On a related note, you can also go ahead and pass along: (1) Plaintiff's full legal name; (2) Plaintiff's date of birth; (3) Plaintiff's full social security number; and (4) Plaintiff's home address and/or an Equifax Confirmation Number, we can go ahead and pull her file. Feel free to respond directly to Courtney Draper with that information.

Thank you.

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From: Robert Bichler <rbichler@brennanlaw.com>
Sent: Monday, May 24, 2021 6:20 PM
To: Barton, Eric <EBarton@seyfarth.com>
Cc: Robert Brennan <rbrennan@brennanlaw.com>; Juan Sanchez <jsanchez@brennanlaw.com>; Fleming, Lindsay A. <lafleming@seyfarth.com>; Tom Quinn <tquinn@nokesquinn.com>; Nancy Mendoza <nmendoza@brennanlaw.com>
Subject: RE: Nicollette demand letter to Equifax

[EXT. Sender]

Eric,

My understanding is there is a hold-up while we wait for the Court in the Northern District to return the stamped Summons to us to serve on Equifax. We should know if that is completed by Wednesday at which time I can update you on the status. Thanks for your understanding.

Robert Bichler
Senior Paralegal

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From: Barton, Eric <EBarton@seyfarth.com>
Sent: Monday, May 24, 2021 2:44 PM
To: Robert Bichler <rbichler@brennanlaw.com>
Cc: Robert Brennan <rbrennan@brennanlaw.com>; Juan Sanchez <jsanchez@brennanlaw.com>; Fleming, Lindsay A. <lfleming@seyfarth.com>; Tom Quinn <tquinn@nokesquinn.com>
Subject: RE: Nicollette demand letter to Equifax

Robert-

I appreciate the demand letter, but I don't believe Equifax has been served yet in this case. Are you showing Equifax has been served?

If not, I'm authorized to accept service if you send me a waiver of service. We'll be handling this matter once Equifax is served. Please advise.

Thank you.

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From: Robert Bichler <rbichler@brennanlaw.com>
Sent: Monday, May 24, 2021 2:30 PM
To: Barton, Eric <EBarton@seyfarth.com>; Fleming, Lindsay A. <lafleming@seyfarth.com>; Tom Quinn <tquinn@nokesquinn.com>; Robert Brennan <rbrennan@brennanlaw.com>
Cc: Robert Brennan <rbrennan@brennanlaw.com>; Juan Sanchez <jsanchez@brennanlaw.com>
Subject: Nicollette demand letter to Equifax

[EXT. Sender]

Counsel,

Attached please find Plaintiff Jack Nicollette's demand letter to Equifax.

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Senior Paralegal

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